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11 UNITED STATES DISTRICT COURT FOR THE
12 CENTRAL DISTRICT OF CALIFORNIA
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15 RAVENWOOD-PRODUCTIONS LLC, a
16 Colorado corporation; and KEVIN V.
17 DUNCAN, an individual,
18 Plaintiffs,
19 vs.
20 DAVID OZER, an individual; STRONG
21 STUDIOS, INC., a Delaware corporation;
22 MARK ROBERSON, an individual; TODD
23 MAJOR, an individual; KYLE
24 CERMINARA, an individual; LARRY
25 SWETS, an individual; HASSAN BAQAR,
26 an individual; MATT HARTON, an
individual; PETER ODIORNE, an
individual; SAFEHAVEN 2022, INC., a
Delaware corporation; UNBOUNDED
MEDIA CORPORATION, a Delaware
corporation; STRONG TECHNICAL
SERVICES, INC., a Nebraska corporation;
STRONG GLOBAL ENTERTAINMENT,
INC., a British Columbia corporation;
STRONG SIGNATURES, LLC, a
Delaware Corporation; and DOES 1 through
15, inclusive,
Defendants.

)) Case No.: 2:24-cv-03532-FLA
Case No.: 2:24-cv-03532-FLA
JOINT STATUS REPORT AND
STIPULATION TO CONTINUE
STAY OF CIVIL CASE DURING
PENDENCY OF CRIMINAL CASE

Complaint Served: June 4, 2024
Answers Filed: November 4, 2024

Plaintiffs RAVENWOOD-PRODUCTIONS LLC and KEVIN V. DUNCAN
("Plaintiffs") and Defendant DAVID OZER ("OZER") and STRONG STUDIOS, INC.

1 (“STRONG”) (OZER and STRONG are collectively referred to as “Defendants”), by and
2 through their undersigned attorneys, report and stipulate as follows:

3 1. On November 26, 2024, the Court stayed this civil action until February 11, 2025
4 (Dkt. 41), in response to a stipulation by the parties (Dkt. 40) seeking the stay based on the
5 pendency of a parallel criminal case against Defendant Ozer in USA v. Ozer, Case No. 2:24-cr-
6 00463-SB, which makes allegations and fraud charges that in part overlap the allegations made
7 in the underlying civil complaint (the “Criminal Case”). At the time of the stay, Mr. Ozer’s
8 sentencing in the Criminal Case was scheduled for January 28, 2025. Thus, the Court ordered
9 the Parties to file a joint status report on or before February 11, 2025 regarding Mr. Ozer’s
10 sentencing in USA v. Ozer, Case No. 2:24-cr-00463-SB. The Court’s November 26, 2024 order
11 also contemplated the parties filing a renewed stipulation to stay.

12 2. Since the entry of the initial stay order, Mr. Ozer and the government entered into
13 a superseding plea agreement in the Criminal Case, filed with the court on December 12, 2024 in
14 USA v. Ozer, Case No. 2:24-cr-00463-SB. As a result, the Honorable Stanley Blumenfeld Jr in
15 the Criminal Case converted the January 28, 2025 sentencing date into a change of plea on the
16 new plea agreement, and thereafter set Mr. Ozer’s sentencing for May 6, 2025.

17 3. Accordingly, the parties on February 10, 2025, filed with the Court (Dkt. 45), A
18 Joint Status Report And Stipulation seeking that the stay of the underlying civil case remain in
19 place until May 20, 2025. In response, the Court stayed the action until May 6, 2025 (Dkt. 46),
20 and ordered the parties to file a joint status report on or before May 6, 2025 regarding Defendant
21 Ozer’s sentencing.

22 4. As of this filing, counsel for the respective parties are unable to provide an update
23 concerning the sentence of Mr. Ozer and how it may impact the further proceedings in this
24 matter because no sentencing order or judgment is available on PACER, although it appears that
25 Mr. Ozer may be given a self-surrender date of July 14, 2025 according to a filing by Ozer in the
26 criminal case.

27 5. Accordingly, the parties are seeking a further stay of the case through June 16,
28 2025 to process the impact of the criminal sentencing on these proceedings, including the extent

1 to which any restitution award in the criminal case may offset some or all of Plaintiff's damages,
2 as well as Defendant Ozer's intention with respect to any ongoing defense of the underlying civil
3 case. Attorney Chernis represents that Defendant Ozer last communicated with him in February
4 2025 at which time he indicated the intention to retain new counsel, and that if Defendant Ozer
5 does not retain new counsel Attorney Chernis intends to refile a motion for to withdraw as
6 counsel.

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8 DATED: May 6, 2025

/s/ Michael Freedman

9 Michael G. Freedman, SBN 281279
10 Attorney for Ravenwood-Productions LLC and
11 Kevin V. Duncan

12 DATED: May 6, 2025

13 
14 Michael S. Chernis, SBN 259319
15 Attorney for Defendants David Ozer and Strong
16 Studios, Inc.

17 **The undersigned filer attests that all the signatories listed, on whose behalf the filing is
18 submitted, concur in the filing's content and have authorized the filing.**

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20 Michael S. Chernis

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